

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

DANIEL LOVELACE AND HELEN
LOVELACE

Plaintiffs,

vs.

PEDIATRIC ANESTHESIOLOGISTS, P.A.;
DR. BABU RAO PAIDIPALLI &
DR. MARK P. CLEMONS

Defendants.

Case No. 2:13-CV-02289-JPM-dkv

**METHODIST HEALTHCARE - MEMPHIS HOSPITALS' MOTION FOR LEAVE TO
FILE REPLY BRIEF**

COMES NOW non-party Witness Methodist Healthcare – Memphis Hospitals (“Methodist” or “Witness”), by and through undersigned counsel, and pursuant to Local Rule 7.2(c) files this Motion for Leave to File a Reply Brief to Response of Defendants, Pediatric Anesthesiologists, P.A. and Babu Rao Paidipalli, M.D. (“Defendants”), to Methodist Healthcare - Memphis Hospitals' Objections to Magistrate's Order Regarding Motion to Quash Defendants' Subpoena and Motion for Protective Order.

On November 4, 2013, Methodist filed its Objections to Magistrate's Order Regarding Motion to Quash Defendants' Subpoena and Motion for Protective Order. Defendants filed their Response on November 14, 2013. Defendants' Response raises new issues not raised in Methodist's Objections to the Magistrate's Order, particularly regarding information they

anticipate gleaning from the Settlement Agreement. In order to address the issues raised in Defendants' Response, Methodist requests leave of Court to file a Reply brief.

Respectfully submitted,

s/ Craig C. Conley

Craig C. Conley (# 19341)
Ormonde B. DeAllaume (# 26266)
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: (901) 526-2000
Facsimile: (901) 577-2303
cconley@bakerdonelson.com
odeallaume@bakerdonelson.com

*Attorneys for Non-Party Witness
Methodist Healthcare – Memphis Hospitals*

CERTIFICATE OF CONSULTATION

Pursuant to Local Rule 7.2(a)(1)(B), I hereby certify that, on November 20, 2013, counsel for Methodist conferred with counsel for Plaintiffs via e-mail concerning the contents of this Motion.

s/ Craig C. Conley

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 20th day of November, 2013, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system, which will send a notification to the attorneys of record in this matter who are registered with the Court's CM/ECF system.

s/ Craig C. Conley